

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)
)
 V.)
)
 MOISES ORLANDO ZELAYA-VELIZ,)
 a/k/a MOISES ZELAYA-BELIZ)
 a/k/a MOIZES ZELAYA BONILLA, a/k/a)
 ZELAYA HERNANDEZ;)
)
)
 SIONI ALEXANDER BONILLA)
 GONZALEZ, a/k/a SONIC, a/k/a)
 ALEXANDER BONILLA; a/k/a)
 CERBERO GONZALEZ; a/k/a)
 CATRACHITO GONZALEZ)
)
)
 CARLOS JOSE TURICIOS VILLATORO,)
 a/k/a JOSE FUNES, a/k/a GUZMAN)
 ANTONIO, a/k/a OCULTO)
 a/k/a ESCONDIDO;)
)
)
 JOSE ELIEZAR MOLINA-VELIZ;)
 a/k/a JOSE ELIEZAR HERNANDEZ;)
)
)
 SANTOS ERNESTO GUTIERREZ CASTRO,)
 a/k/a GUTIERREZ HERNESTHO)
)
)
 LUIS ALBERTO GONZALES, a/k/a LUIS)
 FIGO, a/k/a CHINA, a/k/a CHINITA;)
)
)
 REINA ELIZABETH HERNANDEZ,)
 a/k/a ELIZABETH HERNANDEZ,)
)
)
 NELSON EZEQUIEL)
 CABALLERO PORTILLO;)
)
)
 GILBERTO MORALES, a/k/a CHAPIN,)
 a/k/a CHUCHA;)
)
)
 JONATHAN RAFAEL ZELAYA-VELIZ)
 a/k/a RAFAEL ZELAYA, a/k/a)
 JONATHAN ZELAYA; and)

UNDER SEAL
No. 1:20-MJ-215

ORLANDO ALEXIS SALMERON FUNEZ)
a/k/a ALEXIS SALMERON, a/k/a ALEXIS)
FUNEZ,)
Defendants.)

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, Jeremy Obie, Special Agent of the Federal Bureau of Investigation (FBI),
Washington, D.C., Field Office, Northern Virginia Resident Agency, being duly sworn, depose
and state the following:

1. Your Affiant has been employed by the FBI since March 2016, and I am currently assigned to the FBI Washington Field Office Child Exploitation and Human Trafficking Taskforce. While employed by the FBI, I have received training and have investigated various federal criminal violations related to violent crimes, sexual exploitation crimes, and gang related human trafficking. I have received training and have been involved in investigations involving criminal activities of the violent international street gang La Mara Salvatrucha Trece, also known as MS-13, and have become familiar with the structure and organization of the gang, its terminology and indicia, and its use of social media applications to communicate. Prior to this assignment, I worked for the Department of Defense as an Electrical Engineer. I have a Bachelors of Science and a Masters of Science in Electrical Engineering.

2. The facts and information contained in this affidavit are based upon my personal knowledge of the investigation, observations of other law enforcement officers and agents involved in this investigation, and information provided by witnesses. All observations referenced below that I did not personally make were relayed to me by the persons who made such observations.

3. This affidavit contains information necessary to support probable cause for this application. Because this affidavit is being submitted for the limited purpose of establishing probable cause for this application, I have not included every detail known to the government. Rather, I have set forth only those facts that I believe are necessary to establish probable cause.

4. I submit this affidavit in support of a criminal complaint and arrest warrant charging (1) **SIONI ALEXANDER BONILLA GONZALEZ**, a/k/a **SONIC**, a/k/a **ALEXANDER BONILLA**; a/k/a **CERBERO GONZALEZ**; a/k/a **CATRACHITO GONZALEZ** and (2) **CARLOS JOSE TURICIOS VILLATORO**, a/k/a **JOSE FUNES**, a/k/a **GUZMAN ANTONIO**, a/k/a **OCULTO**, a/k/a **ESCONDIDO**, with Violent Crimes in Aid of Racketeering Activity in violation of 18 U.S.C. §§ 1959(a)(3) and 2.

5. I further submit this affidavit in support of a criminal complaint and arrest warrant charging (1) **MOISES ORLANDO ZELAYA-VELIZ**, a/k/a **MOISES ZELAYA-BELIZ**, a/k/a **MOIZES ZELAYA BONILLA**, a/k/a **ZELAYA HERNANDEZ**; (2) **SIONI ALEXANDER BONILLA GONZALEZ**, a/k/a **SONIC**, a/k/a **ALEXANDER BONILLA**, a/k/a **CERBERO GONZALEZ**, a/k/a **CATRACHITO GONZALEZ**; (3) **JOSE ELIEZAR MOLINA-VELIZ**, a/k/a **JOSE ELIEZAR HERNANDEZ**; (4) **SANTOS ERNESTO GUTIERREZ CASTRO** a/k/a **GUTIERREZ HERNESTHO**; (5) **LUIS ALBERTO GONZALES**, a/k/a **LUIS FIGO**, a/k/a **CHINA**, a/k/a **CHINITA**; (6) **REINA ELIZABETH HERNANDEZ**, a/k/a **ELIZABETH HERNANDEZ**; (7) **NELSON EZEQUIEL CABALLERO PORTILLO**; (8) **GILBERTO MORALES**, a/k/a **CHAPIN** a/k/a **CHUCHA**; (9) **JONATHAN RAFAEL ZELAYA-VELIZ**, a/k/a **RAFAEL ZELAYA**, a/k/a **JONATHAN ZELAYA** and (10) **ORLANDO ALEXIS SALMERON FUNEZ**, a/k/a **ALEXIS SALMERON**, a/k/a **ALEXIS FUNEZ** with sex trafficking of a minor in violation of 18 U.S.C. §§ 1591(a)(1), (b)(1), (c) and 2.

RELEVANT STATUTES

6. 18 U.S.C. § 1959(a)(3) provides in part “whoever...for the purpose of gaining entrance to or maintaining or increasing position in an enterprise engaged in racketeering activity.... assaults with a dangerous weapon, [or] commits assault resulting in serious bodily injury” shall be punished.

7. Section 18.2-51 of the Virginia Code provides in part, “If any person maliciously shoot, stab, cut, or wound any person or by any means cause him bodily injury, with the intent to maim, disfigure, disable, or kill,” that person shall be guilty of a criminal offense. Section 18.2-54 also prohibits an individual from engaging in assault and battery.

8. 18 U.S.C. §§ 1591(a)(1), (b)(1), & (c) prohibits the sex trafficking of children or any person by force, fraud, or coercion. In relevant part, Section 1591 prohibits a person, in or affecting interstate commerce, from knowingly recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, patronizing or soliciting a person knowing or reckless disregard of the fact that means of force, threats of force, fraud, coercion, or any combination of such means will be used to cause the person to engage in a commercial sex act, or knowing, or in reckless disregard, or after having a reasonable opportunity to observe that the person has not attained the age of 18 years old and will be caused to engage in a commercial sex act. 18 U.S.C. § 1594(c) prohibits conspiracies to engage in such conduct.

9. Pursuant to 18 U.S.C. § 1591(e)(3), the term “commercial sex act” means any sex act, on account of which anything of value is given to or received by any person. “Anything of value” includes items such as money and drugs.

STATEMENT OF PROBABLE CAUSE

10. The FBI, Fairfax County Police, and Prince William County Police are investigating the bat beating and sex trafficking of a girl when she was 13 years old by various members and associates of the criminal street gang MS-13 that occurred between August 27, 2018 through October 11, 2018. (The 13-year old victim is hereinafter referred to as MINOR 2).

11. As discussed more fully below, evidence and witness statements obtained during the investigation has revealed that MINOR 2 was beaten by various members of MS-13 with a baseball bat 26 times on two separate occasions in or around Woodbridge, Virginia. Additionally, MINOR 2 was sex trafficked by MS-13 gang members and associates in Northern Virginia and Maryland and used cash and drugs as currency for the commercial sex.

BACKGROUND INFORMATION ON MS-13

12. MS-13 is a violent international street gang involved in a variety of criminal activities, including murder, assault, kidnapping, obstruction of justice, drug trafficking, and sex trafficking, in the Eastern District of Virginia and elsewhere.

13. MS-13 has operated in the Eastern District of Virginia since at least 1993. MS-13 members and associates are located throughout the United States, including Virginia, Maryland, New York, and California. MS-13 also has a large international presence in El Salvador, Guatemala, Honduras, and Mexico.

14. MS-13 recruits members and associates predominantly from the Hispanic community, typically juveniles. Recruits are typically "jumped in" to the gang by being physically beaten by members and associates while a member counts to 13.

15. In order to protect the power, reputation, and territory of MS-13, members and associates are required to use violence, threats of violence, and intimidation. These acts of violence

often include murder and assault with dangerous weapons. MS-13 members and associates maintain and enhance their status in the gang by participating in such violent acts. MS-13 members and associates also often commit acts of violence, including murder and assaults with dangerous weapons, at the behest and direction of higher-ranking members of the gang.

16. MS-13 recruits are indoctrinated into MS-13 rules, which are ruthlessly enforced. One prominent rule encourages MS-13 members and associates to confront, fight, and kill rival gang members, known as "chavalas." When an MS-13 member or associate encounters a chavala, the gang member is to attack the chavala with anything available – from fists to machetes and firearms. In addition to attacking chavalas, MS-13's rules prohibit members and associates from cooperating with law enforcement. If a member violates this rule, the member may be subjected to a beating or be killed for "snitching" on the gang.

17. MS-13 is organized into local groups known as "cliques" that hold regular meetings to coordinate gang activities. Each clique is run by the senior leader, who is designated the "First Word," and the second-in-command, who is designated the "Second Word." The general members of the gang are known as "soldiers" and take their orders from the "First Word" or the "Second Word." Soldiers are typically "chequeos," prospective gang members, or "homeboys," full gang members who have engaged in significant criminal activity on behalf of MS-13. The leaders of the respective cliques attend larger general meetings to manage gang operations on a regional and international level.

18. MS-13 members must attend clique meetings once or twice a month depending on the clique. At each clique meeting, a member is usually required to pay dues to the clique leaders. The money is used to finance clique activities, to provide support for clique members who are in jail, and to fund the MS-13 enterprise in El Salvador where many of the top gang leaders are based.

19. To promote their gang identity, MS-13 members and associates often wear blue or white clothing, as well as clothing displaying the number "13" or numbers that total 13, such as "76." MS-13 members and associates also often have tattoos reading "Mara Salvatrucha," "MS," or "MS-13" and mark their territory with graffiti displaying the names and symbols associated with the gang. One such symbol is the MS-13 hand sign, meant to resemble both an inverted "M" and the face of the devil, with outstretched fingers representing the devil's horns.

**MS-13 IS AN "ENTERPRISE" WHOSE ACTIVITIES AFFECT
INTERSTATE AND FOREIGN COMMERCE**

20. MS-13, including its leaders, members, and associates, constitutes an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that engages in, and the activities of which affect, interstate and foreign commerce. MS-13 is an ongoing organization whose members and associates function as a continuing unit for a common purpose of achieving the objectives of the enterprise.

21. The purposes of the MS-13 enterprise include the following:

- a. Preserving, expanding, and protecting the power, territory, and reputation of MS-13 through the use of violence, threats of violence, and intimidation;
- b. Promoting and enhancing MS-13 and the activities of its members and associates by committing crimes, including but not limited to, assault and murder;
- c. Keeping victims, potential victims, and community members in fear of MS-13 and its members and associates through violence, threats of violence, and intimidation;
- d. Confronting and retaliating against rival gangs through the use of violence, threats of violence, and intimidation;
- e. Ensuring discipline within the enterprise and compliance with the enterprise's rules by members and associates through threats of violence and acts of violence;

- f. Enriching the members and associates of the enterprise through criminal activity, including robbery, prostitution, and narcotics trafficking;
- g. Hindering and obstructing efforts of law enforcement to identify, apprehend, and successfully prosecute offending gang members; and
- h. Providing financial support and information to MS-13 members, including those incarcerated in the United States and El Salvador.

22. Among the means and methods by which MS-13 members and associates conduct and participate in the conduct of the affairs of the enterprise are the following:

- a. MS-13 members and associates use violence, threats of violence, and intimidation, including murder, attempted murder, robbery, kidnapping and assault, to preserve, protect, and expand the enterprise's territory and criminal operations and to enhance its prestige, reputation, and position in the community;
- b. MS-13 members and associates promote a climate of fear through violence, threats of violence, and intimidation, including against members of rival gangs;
- c. MS-13 members and associates use violence, threats of violence, and intimidation to discipline and punish members and associates who violate enterprise rules;
- d. MS-13 members and associates use telephones to discuss gang-related business and to obtain approval for the use of violence to further the purposes of MS-13;
- e. MS-13 members and associates use, attempt to use, and conspire to use robbery, extortion, sex trafficking, and narcotics trafficking as a mechanism to obtain money; and
- f. MS-13 members and associates collect dues to send to MS-13 members incarcerated in the United States and El Salvador and to MS-13 leadership in El Salvador, in an effort to provide financial support to the enterprise.

MS-13 Engages in Racketeering Activity

23. MS-13, through its members and associates, engages in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is, acts involving murder, kidnapping, and robbery, in violation of the laws of the Commonwealth of Virginia; acts indictable under Title 18, United States Code, Sections 1503 (obstruction of justice), 1512 (witness

tampering) and 1591, 2421 and 2422 (sex trafficking and commercial sex violations); and offenses involving drug trafficking, in violation of Title 21, United States Code, Sections 841 and 846.

UNDERLYING INVESTIGATION

24. On August 27, 2018, 13-year old MINOR 2 and 16-year old MINOR 3 ran away together from a facility called Shelter Care located in Fairfax, Virginia. Shelter Care is a court-ordered, group home facility for children under the age of 18.

25. On September 4, 2018, MINOR 3 was recovered by Prince William County Police after she was caught shoplifting at a Target. The next day, a Fairfax County Detective went to the Target to review surveillance footage and reported that the surveillance footage revealed that MINOR 2 was also present at the Target but she was permitted to leave the premises by Target staff because she was not shoplifting.

26. On October 11, 2018, the FBI's Child Exploitation and Human Trafficking Task Force recovered MINOR-2 at or around 3350 Chillum Road, Mt. Rainier, MD, in an apartment complex known as the Queenstown Apartments.

27. Law enforcement interviewed MINOR-2 and MINOR-3 on multiple occasions. During initial interviews with MINOR 2 and MINOR-3, both were hesitant to disclose some information about various things that happened while they were missing and, at times, they initially refused to answer questions about certain topics or individuals.

MEMBERS OF MS-13 BEAT MINOR 2 WITH A BASEBALL BAT ON TWO OCCASIONS

28. Through interviews with MINOR 2, law enforcement learned that MINOR 3 talked with MINOR 2 about MS-13 prior to running away from Shelter Care together. MINOR 2 learned from MINOR 3 that MINOR 3 had friends who were in MS-13. MINOR 3 informed MINOR 2 that there were three ways to be initiated into the gang: through being beaten with a baseball bat,

to be beaten physically by numerous gang members at once for a certain amount of time, or by having sex with all of gang members one after another.

29. After MINOR 3 and MINOR 2 ran away from Shelter Care together, MINOR 2 informed law enforcement that she and MINOR 3 stayed overnight at the residence of **VILLATORO**. MINOR 2 identified a picture of a male known by law enforcement to be **VILLATORO**. MINOR 2 knew him as “JOSE FUNES” or “Josue.” **VILLATORO** was a member of MS-13. MINOR 3 knew **VILLATORO** previously and introduced him to MINOR 2.

30. While at **VILLATORO**’s residence, MINOR 2 informed law enforcement that **VILLATORO** engaged in sexual intercourse with MINOR 2. MINOR 3 also informed law enforcement that **VILLATORO** engaged in sexual intercourse with MINOR 2.

31. MINOR 2 informed law enforcement that she obtained musical headphones from **VILLATORO**, along with a cell phone that she used for multiple days. MINOR 2 and MINOR 3 also had access to a backpack that belonged to **VILLATORO**. During the investigation, law enforcement located photographs of MINOR 2 wearing headphones identical to headphones that **VILLATORO** also wore. Additionally, law enforcement located communications on Facebook indicating that MINOR 2 was in possession of **VILLATORO**’s phone.¹

32. MINOR 2 identified **VILLATORO**’s residence on a Google map, as well as, in person as being located at a specific address on Eastlawn Avenue in Woodbridge, Virginia. The residence was near a 7-11. MINOR 3 also confirmed that **VILLATORO**’s residence was near the 7-11.

¹ The targets and victims in this case are native Spanish speakers. When discussing social media messages and/or text messages herein, an FBI Spanish Linguist translated the messages from Spanish to English.

33. Some time after leaving **VILLATORO's** residence, MINOR 2 stated that she and MINOR 3 walked to another residence that had a garage. MINOR 2 also noted that the garage contained a couch and baseball bats. There was also a dog at the residence. MINOR 2 identified the following people at the garage through names and photograph identification: her, MINOR 3, MINOR 1, **BONILLA GONZALEZ** and **VILLATORO**. MINOR 2 knew **BONILLA GONZALEZ** by the name **SONIC**. MINOR 2 believed additional MS-13 gang members or associates were present at the garage but she could not identify anyone by name or photograph.

34. While in the garage, MINOR 2 was asked if she wanted to be a member of MS-13. She was told they would protect her and her family. MINOR 2 agreed.

35. MINOR 2 was directed to stand facing the wall with her hands on the wall and to spread her legs. She was then beaten with a metal baseball bat 26 times on her buttocks and the back of her legs. While multiple people were present in the garage, MINOR 2 identified **BONILLA GONZALEZ** and **VILLATORO** as two of the individuals who took turns beating her with the metal bat. MINOR 2 could hear other people in the garage laughing and talking and she believed MINOR 3 was present at the moment she was beaten.

36. MINOR 2 was told by **BONILLA GONZALEZ** and MINOR 3 that MS-13 and 18th Street gang did not get along. She was also told she could not leave the gang and if she did leave they would harm her family.

37. After the bat beating, MINOR 2 and MINOR 3 stayed at the residence belonging to both **MOISES** and **JOSE ELIEZAR** in Woodbridge, Virginia. MINOR 2 identified **MOISES** in photographs and knew him as **MOISES**. MINOR 2 identified a picture of **JOSE ELIEZAR** and stated he was a brother of **MOISES**. Evidence and other statements reveals that MINOR 2

was sex trafficked at their residence and other locations. The statements and evidence tied to the sex trafficking is described in the next section of this affidavit (*see infra*).

38. After the bat beating in the garage, MINOR 2 communicated with a specific male on Facebook with a user name hereinafter referred to as "C.G." MINOR 3 informed MINOR 2 that "C.G." was a member of MS-13 who was high up in the gang.

39. According to MINOR 2, "C.G." learned that MINOR 2 had been beaten and asked MINOR 2 to send pictures of who beat her. MINOR 2 sent pictures of **VILLATORO** to "C.G." A review of social media messages obtained during this investigation reveals that MINOR 2 sent "C.G." the pictures of **VILLATORO**, which she obtained while in possession of **VILLATORO**'s cell phone, on or about September 7, 2018.

40. At some point, there was a dispute about items that were missing from **VILLATORO**. During interviews with MINOR 2, she informed law enforcement she was accused by MINOR 3 of taking items from **VILLATORO**. MINOR 2 also explained that she had two friends who were members of a different gang and as a result she was accused of hanging out with gang members outside of MS-13 (a/k/a "chavalas").

41. MINOR 2 stated she provided **VILLATORO**'s items to **BONILLA GONZALEZ**, who then provided the items to **VILLATORO**. As punishment, MINOR 2 was beaten again by **BONILLA GONZALEZ** and **VILLATORO** with a baseball bat. MINOR 2 informed law enforcement she was beaten 26 times on her buttocks and back of her legs.

42. A review of social media records from MINOR 2's account shows that she posted a photo of her naked, bruised buttocks and sent the photo to individuals on a group chat on September 22, 2018 (21:35:06 UTC). In the photo, MINOR 2 is standing in a bathroom mirror taking a selfie of the back of her body. A review of the bathroom setting and other evidence in this

case reveals MINOR 2 was in **NELSON EZEQUIEL CABALLERO PORTILLO's** bathroom at the time she took the photograph (as discussed further in next section of this affidavit). MINOR 2's nude buttocks are fully exposed and are visibly bruised. In the group chat between MINOR 2 and others, a female was talking about problems she was having with a homeboy in El Salvador and that the homeboy was going to kill her sisters if she did not send him naked pictures. MINOR 2 informed the group that she was beaten 26 times with a baseball bat. The female in the group chat expressed her concern for MINOR 2 and the female stated that she herself had been beaten 13 times previously.

43. As to the first bat beating MINOR 2 endured in the garage, social media communications dated August 31, 2018 (00:13:42: UTC to 00:16:53 UTC) revealed MINOR 2 telling an individual known to her that she was the girlfriend of a MS-13 gang member and that they were going to beat her and her female friend the day prior with a bludgeon or a club. MINOR 2 further stated she would send a picture once they beat her. On August 31, 2018 (15:55:15 UTC), MINOR 2 informed an individual known to her the following: "if I want to leave the gang MS13 will kill me." Furthermore, on September 8, 2018, MINOR 2 informed another user on social media that "I am MS13."

44. Law enforcement interviewed MINOR 3 about the bat beating of MINOR 2. MINOR 3 discussed being present in the garage where MINOR 2 stated she was first beaten. MINOR 3 and MINOR 2 were previously at the residence belonging to **MOISES** and **JOSE ELIEZAR** and then walked to the garage. While walking to the garage, MINOR 2 talked about being friends with members of the 18th Street gang. MINOR 3 stated she felt scared to be around MINOR 2.

45. MINOR 3 stated there was a table in the garage with metal baseball bats and knives laid out, including a machete. She also noted there was a couch in the garage and a dog at the residence. People were hanging out. Through photographs, MINOR 3 identified the following people as being present: MINOR 2, MINOR 1, **BONILLA GONZALEZ**, **VILLATORO**, and an additional individual who is known by law enforcement to be a member of MS-13. MINOR 3 called **BONILLA GONZALEZ** by his middle name **ALEXANDER**, which he went by often, and noted that other people called him **SONIC**. While identifying pictures of **VILLATORO**, she knew him as **CARLOS** and believed his name was **CARLOS FUNES**.

46. When discussing MINOR 1, MINOR 3 explained that MINOR 1 was the girlfriend of **BONILLA GONZALEZ** and may have also been intimately involved with **VILLATORO**. MINOR 2 also was informed by MINOR 1 that she was in a romantic relationship with both **BONILLA GONZALEZ** and **VILLATORO**. MINOR 3 noted there were other individuals present in the garage but she did not know their names and was unable to identify them through pictures.

47. MINOR 3 denied knowing that MINOR 2 was beaten in the garage. She did, however, state that she had knowledge of the second bat beating of MINOR 2.

48. MINOR 3 informed law enforcement there was a dispute over missing items belonging to **VILLATORO**. She also informed law enforcement that MINOR 2 had previously told her she was friends with members of the 18th Street gang.

49. In regards to the missing items, MINOR 3 discussed receiving threatening audio messages from MINOR 1. Law enforcement recovered the threatening audio messages MINOR 3 received from MINOR 1. The messages, translated by a FBI Spanish linguist, provided as follows:

“Look this is what’s going on. We are looking for you, young females, and that other little young female. A whole bunch of homies and I, because we are going to beat you two daughters of a bitch with a baseball bat for having sticky hands. We are going to cut your fingers and your hands too to both of you to teach you a lesson, daughters of a bitch.”

“Look young girl. **CARLOS** will beat both of you, daughters of a bitch. For taking his phone and the fucking backpack. And you took a lot of clothes and shoes from me, fucking bitches. And I will beat you [plural] too with a baseball bat. So, watch out.”

50. MINOR 3 informed law enforcement that it was MINOR 2 who took the bookbag and used other items belonging to **VILLATORO**, including the phone and headphones.

51. MINOR 3 informed law enforcement that she talked with **BONILLA GONZALEZ** over audio call to explain the situation in response to the threatening messages she received from MINOR 1. Over audio call, **BONILLA GONZALEZ** informed MINOR 3 that he would look into what happened and if MINOR 3 took the items, she would be beaten. If MINOR 1 wrongfully accused MINOR 3, then MINOR 1 would be beaten.

52. Law enforcement executed search warrants on numerous social media accounts during this investigation, including Facebook accounts belonging to username **CERBERO GONZALEZ** and **CATRACHITO GONZALEZ**. A review of the evidence from the **CERBERO GONZALEZ** and **CATRACHITO GONZALEZ** accounts reveals it was used by **BONILLA GONZALEZ** based on, *inter alia*, statements made identifying him by name, photographs of him found therein, and his friend lists. A review of evidence obtained from the social media account reveals that MINOR 3 and **BONILLA GONZALEZ/CERBERO GONZALEZ** engaged in audio calls with each other on September 15, 2018 at 00:25:59 UTC and 01:16:56 UTC.

53. MINOR 3 informed law enforcement she also forwarded the threatening messages to **BONILLA GONZALEZ** over the social media platform. A review of the social media

evidence reveals that MINOR 3 forwarded the threatening messages to **BONILLA GONZALEZ/CERBERO GONZALEZ** on September 15, 2018 at 01:18:19 UTC and 01:18:56 UTC.

54. A review of social media evidence reveals that after **BONILLA GONZALEZ** received the threatening messages that had been forwarded, he sent MINOR 3 the following audio message on September 15, 2018 (1:23:59 UTC):

“Ok. Look, don’t get yourself in trouble, young female. I already told you what will happen. And if you are putting things in the head of other homies you will get yours too, daughter of a bitch.”

55. Evidence recovered from social media also reveals that **BONILLA GONZALEZ/CERBERO GONZALEZ** typed in searches for MINOR 2 by using MINOR 2’s first and last name. The searches using MINOR 2’s first and last name occurred on, among other dates, September 15, 2018 at 19:02:59 UTC and September 16, 2018 at 05:46:05 UTC.

56. MINOR 3 also explained that she herself had a boyfriend at the time. MINOR 3 provided the specific name of her boyfriend to law enforcement [hereinafter BOYFRIEND]. MINOR 3 stated BOYFRIEND lived in El Salvador and was higher up in MS-13. Through Facebook GPS location data, law enforcement discovered that BOYFRIEND was in El Salvador in or around the time of MINOR 2’s exploitation. According to MINOR 3, she communicated with BOYFRIEND over Facebook and over the phone. BOYFRIEND told MINOR 3 he gave **BONILLA GONZALEZ** the order to beat MINOR 2 because she was hanging out with members of the 18th Street gang and doing “other bad things.” BOYFRIEND wanted to watch the beating live and wanted **BONILLA GONZALEZ** to video live-feed the beating with a phone. BOYFRIEND told MINOR 3 that MINOR 2 was beaten 26 times and “peed herself” during the beating.

57. A review of Facebook evidence shows that **VILLATORO** used the social media account **JOSE FUNES** and later changed the name to **GUZMAN ANTONIO**. Law enforcement uncovered communications showing user attribution evidence that **VILLATORO** was the user of the account based on, *inter alia*, photographs, statements he made identifying himself, and statements about the address where he was living.

58. A review of social media communications reveals conversations between **VILLATORO** and **BONILLA GONZALEZ/CERBERO GONZALEZ** regarding the bat beating, stating, in part:

CERBERO GONZALEZ (9-20-18: 19:24:24 UTC) : We need to do this thing right away. They had that young female there for a long time now and that the young female is afraid and she might escape.

....

GUZMAN ANTONIO (9-20-18: 19:36:04 UTC): The homeboy says that he is coming soon. He needs to take out some stuff from the car. He will pick you up first and then come for me.

CERBERO GONZALEZ (9-20-18 19:37:31 UTC): Yes doggy. Tell him to come. I am dying to hit that daughter of a bitch with a baseball bat.

GUZMAN ANTONIO (9-20-18 19:39:29 UTC and 19:52:56 UTC): The homeboy just told me that he would be coming soon. Be ready. He might text you or he might text me. Let me know when you leave from there. ... Has Christian arrived there?

CERBERO GONZALEZ (9-20-18:19:53:59 UTC): No, he has not arrived yet. I am waiting here. The homeboy Venga had called me about that young female three times already and a homeboy from El Salvador called me twice asking if I already had that young female because a homeboy in El Salvador wants to watch what happens.

59. Messages recovered in the Facebook account of **JOSE ELIEZAR HERNANDEZ** indicate that MINOR 2 was harbored at the residence of **JOSE ELIEZAR HERNANDEZ** and **MOISES** in Woodbridge, Virginia shortly before the bat beating. On September 20, 2018 (22:45:36 to 22:46:59 UTC), user **JOSE ELIEZAR HERNANDEZ** sent a message to user **GUTIERREZ HERNESTHO** asking, "Where are you[?]" User **JOSE ELIEZAR HERNANDEZ** further stated "This young female is here. Come. We are going to beat her on the chest. You are going to get it too if you don't."

60. Additional messages on the social media platform revealed **VILLATORO/GUZMAN ANTONIO** talking with two other known members of MS-13 about the bat beating. In messages dated September 20, 2018 (19:23:55 UTC to 19:33:35 UTC) **VILLATORO/GUZMAN ANTONIO** discussed going to beat a girl with a baseball bat with "Zonic" and that **VILLATORO/GUZMAN ANTONIO** had "already talked to the homeboy dog."

61. In social media messages dated September 21, 2018 (00:17:43 UTC) **VILLATORO/GUZMAN ANTONIO** informed another known MS-13 gang member that the girl "gave me the things. She was hit with the baseball bat by several people. She had it coming."

62. Through the investigation, law enforcement obtained evidence that MINOR 3's BOYFRIEND used two user names on Facebook. Law enforcement has probable cause to believe that BOYFRIEND is the user of both accounts based on photographs of him in the accounts, MINOR 3's identification of him, and statements made where the user identifies himself.

63. A review of the Facebook evidence revealed **BONILLA GONZALEZ/**
CERBERO GONZALEZ and **BOYFRIEND** talking over the social media platform about
MINOR 2, MINOR 3, and the bat beating. Below are excerpts of the messages:

Cerbero Gonzalez (9-21-18: 02:20:41 UTC): Yes homie I told her that stealing and the video are bullshit. No more stealing. And that The Beast will take her if we saw her hanging out with those snitches again. And that her family would be first if she does not keep her mouth shut."

.....

Listen homie that person stole a backpack from my brother and she just returned the phone she stole from the homeboy...

BOYFRIEND USERNAME (9-21-18 02:30:05 UTC): Ok Who took his phone?

Cerbero Gonzalez (9-21-18 02:37:44 UTC): The one we beat with a baseball bat homie and the other one [MINOR 3] brought them in homie and [MINOR 3] said she did not give a shit homie I told the bitch very clearly what was going to happen. The Beast will take her if she keeps stealing The homie will talk to [MINOR 3] That homeboy is from another clique but we work hand in hand in everything over here.

BOYFRIEND USERNAME (9-21-18 02:38:40 UTC): Is he a homeboy?

Cerbero Gonzalez (9-21-18 02:41:06 UTC to 02:46:39 UTC): No homie....He is paro firme homie We talked about this with the homeboys of both cliques to be on the same page and avoid misunderstandings when we go ahead and do something homie.

64. Law enforcement also located audio messages sent by MINOR 2 to MINOR 3 over social media. In the audio messages, MINOR 2 expressed her anger that she was beaten with a baseball bat and blamed MINOR 3 for making up things that were not true. In part, MINOR 2 stated: "Stop saying things that are not true bitch....I got beaten with a baseball bat because of you....And don't threat me with your *mara* either because it will be worse for you

with the police.” On September 26, 2018 (01:32:45 UTC), MINOR 3 forwarded the audio messages to BOYFRIEND. BOYFRIEND then sent messages back to MINOR 3 containing multiple laughing emojis and his response: “Wants to talk street and doesn’t know how.” MINOR 3 stated, “You think it’s funny but I don’t...Imagine I run into her. I don’t want to fight her because of my baby.”

65. After MINOR 2 was recovered by law enforcement on October 11, 2018, she was taken to a medical doctor in Northern Virginia. A physical examination revealed contusions and tenderness to palpation of MINOR 2’s lower back, buttocks and posterior thighs. The medical report further noted that such contusions and tenderness required blunt force trauma. An MRI demonstrated an infiltrative edema pattern within the subcutaneous soft tissues overlying the right and left buttocks, which was also consistent with subacute soft tissue contusion.

66. MINOR 2 informed law enforcement that after both bat beatings, she had a difficult time walking. During interviews with law enforcement in May 2020, she stated she continues to have problems with her pain in her back as a result of the beatings.

**ADDITIONAL CORROBORATING EVIDENCE SHOWING
THE MS-13 MEMBERSHIP OF BONILLA GONZALEZ AND VILLATORO**

67. A review of the Facebook accounts **CERBERO GONZALEZ** and **CATRACHITO GONZALEZ** belonging to **BONILLA GONZALEZ** reveals numerous discussions about MS-13 involving various targets of this investigation. For example, on June 24, 2018 (02:05:32 UTC), user **MOIZES ZELAYA BONILLA** sent a music video that describes dismembering an MS13 rival with a machete. The cover of the music video sent over Facebook shows a cloaked skeleton holding a scythe with the words “Mara Salvatrucha” and “MS.” In response, user **CATRACHITO GONZALEZ** stated, “What’s up homie! Long live La Mara!” On August 17, 2018 (14:18:00 UTC), user **CATRACHITO GONZALEZ** stated to

MOIZES ZELAYA BONILLA, "What's up? I belong to La Mara dog." In a communication with MINOR 1 in January 2019, **CATRACHITO GONZALEZ** informed her he was a paro.

68. Communications revealed MS-13 gang members working together to distribute drugs such as marijuana in Northern Virginia and elsewhere, including, but not limited to users **CATRACHITO GONZALEZ**, **MOIZES ZELAYA BONILLA**, **JOSE ELIEZAR HERNANDEZ**, and **GUTIERREZ HERNESTHO**.

69. During the investigation, law enforcement also recovered numerous pictures showing the faces of **BONILLA GONZALEZ**, **MOISES** and others throwing up various hand signals associated with MS-13.

70. Law enforcement also recovered communications by user **CATRACHITO GONZALEZ** and **CERBERO GONZALEZ** discussing meetings with various known members of MS-13, including homeboys recently convicted of gang related crimes in the Eastern District of Virginia,

71. A review of the Facebook account belonging to **VILLATORO** (with user name **JOSE FUNES**, later changed to **GUZMAN ANTONIO**) also shows communications involving MS-13. For example, law enforcement located communications between user **GUZMAN ANTONIO** and another known gang member talking about gang meetings, needing to know the gang rules, and discussing the history of MS-13 in preparation for a gang meeting. Furthermore, a review of the Facebook account belonging to **VILLATORO** shows the exchange of written gang rules, regulations, and history to other members of MS-13.

**MINOR 2 IS SEX TRAFFICKED BY
NUMEROUS MS-13 MEMBERS AND ASSOCIATES**

72. As noted above, MINOR 2 was sex trafficked by numerous MS-13 gang members and associates shortly after she and MINOR 3 ran away from Shelter Care on August 27, 2018.

73. According to MINOR 3, MINOR 2 informed her that she would engage in sex in exchange for money, food, and other things that MINOR 2 needed.

74. During interviews with law enforcement, MINOR 2 and MINOR 3 both discussed staying at the residence of **MOISES** and **JOSE ELIEZAR**, two brothers who lived together. Through database reviews and analysis of evidence in this case, law enforcement knows that **MOISES** and **JOSE ELIEZAR** were living at a specific apartment in the Summerland complex on Gableridge Turn in Woodbridge, Virginia.

75. While at the apartment of **MOISES** and **JOSE ELIEZAR**, MINOR 2 disclosed that **MOISES** engaged in sexual intercourse with MINOR 2 in the bathroom.

76. MINOR 3 also informed law enforcement she saw **MOISES** and MINOR 2 go into the bathroom and the next day **MOISES** expressed concern to MINOR 3 that he got MINOR 2 pregnant.

77. MINOR 2 informed law enforcement that multiple men engaged in sex with MINOR 2 in the wooded area behind **MOISES'** apartment. Various men provided her drugs such as marijuana prior to the sexual activity. She identified multiple pictures of men who engaged in sexual activity with her while at or near **MOISES'** premises, all of whom are known by law enforcement to be acquaintances of **MOISES** and **JOSE ELIEZAR** and members or associates of MS-13. Law enforcement also recovered numerous social media messages by those men containing conversations indicative of the sexual exploitation of MINOR 2. MINOR 2 informed law enforcement that **MOISES** knew multiple men were having sex with her in the woods.

78. MINOR 2 and MINOR 3 both identified a photograph of **JOSE ELIEZAR**.

During interviews, MINOR 2 and MINOR 3 both stated **JOSE ELIEZAR** engaged in sexual intercourse with MINOR 2. According to MINOR 3, she saw him engage in sexual intercourse with MINOR 2 while inside **MOISES's** residence in the living room.

79. MINOR 2 recalled **JOSE ELIEZAR** having sex with her in the wooded area behind the apartment of **JOSE ELIAZAR** and **MOISES**. She recalled **JOSE ELIEZAR** having sex with her in the wooded area after other men had already engaged in sexual intercourse with her in that same wooded area.

80. MINOR 2 also identified a picture of **SANTOS ERNESTO GUTIERREZ CASTRO, a/k/a GUTIERREZ HERNESTHO**. She informed law enforcement he was a friend of **MOISES**. She discussed being at a residence with **GUTIERREZ**. While at the residence, she was in a bedroom. Several men came into the bedroom one by one and engaged in sexual activity with her. **GUTIERREZ** collected money from the men. One man paid \$20 directly to MINOR 2. She was also provided marijuana.

81. Geolocation data obtained during the investigation shows MINOR 2 was harbored at multiple residences in Northern Virginia and Maryland, including residences tied to **MOISES, JOSE ELIEZAR, and GUTIERREZ**. Numerous social media conversations involving **MOISES, GUTIERREZ, and others** (described more below) show their active involvement in finding different residences to harbor MINOR 2 for purposes of commercial sex.

82. After the second bat beating, MINOR 2 informed law enforcement that she was in a car with **BONILLA GONZALEZ, VILLATORO**, and an unknown driver. She stated she was taken to an apartment in Maryland that belonged to **REINA**. **BONILLA GONZALEZ** walked her up to the apartment and MINOR 2 met **REINA** and **LUIS**. **BONILLA GONZALEZ** informed **REINA** and **LUIS** that MINOR 2 would make money for them.

83. MINOR 2 identified photographs of a woman she knows as **REINA** that law enforcement obtained from Facebook. Database searches and other evidence in the case revealed her full name is **REINA ELIZABETH HERNANDEZ**. MINOR 2 also identified photographs of the man she knew as **LUIS** that law enforcement obtained from Facebook. Evidence within the case reveal his name is **LUIS ALBERTO GONZALES**.

84. That first night in the apartment belonging to **REINA**, MINOR 2 stated she was in a bedroom and multiple older men came into the bedroom and engaged in vaginal sex, anal sex, and oral sex with MINOR 2.

85. After that first night in the apartment, multiple men continued to come over to engage in sex for money with MINOR 2 at **REINA**'s apartment. **REINA** and **LUIS** collected the money from the men and charged an hourly rate of \$100 per hour. If any men left MINOR 2 a cash tip at **REINA**'s apartment, MINOR 2 provided the cash tip to **REINA**.

86. MINOR 2 stated that **REINA** had her dress "like a prostitute" by having MINOR 2 wear sexy bras and underwear for the men. **REINA** also purchased from a store a lingerie type dress for her to wear. **REINA** would have MINOR 2 try on the bras and underwear to show her how they looked on her.

87. MINOR 2 stated that several of the men who came over for commercial sex were friends of **REINA** and **LUIS**. At times, MINOR 2 was also instructed to post photographs of herself on social media.

88. MINOR 2 informed law enforcement that **LUIS** had sex with her and she viewed **LUIS** as her boyfriend.

89. MINOR 2 also stated that **LUIS** took her to other apartments where men paid **LUIS** to have sex with her. MINOR 2 further noted that several men who had sex with her were friends

of **LUIS**'s and they would provide her drugs and alcohol before the sexual activity occurred. **LUIS**'s friends would pay him money for the sex.

90. When law enforcement showed MINOR 2 a photograph of **NELSON EZEQUIEL CABALLERO PORTILLO**, she informed law enforcement that **LUIS** took her to **NELSON**'s apartment and **NELSON** wanted to have sex with her shortly after she arrived. **NELSON** had sex with her multiple times and paid **LUIS**. MINOR 2 also informed law enforcement that multiple men had sex with her at **NELSON**'s apartment and paid **LUIS**. **NELSON** was present while the men were having sex with her.

91. MINOR 2 identified a photograph of **GILBERTO MORALES**, a/k/a **Chapin**, a/k/a **Chucha** and informed law enforcement he had sex with her more than eight times and paid **LUIS** for the sexual activity. She recalled sexual activity with **MORALES** occurring at **NELSON**'s apartment. She also informed law enforcement that **MORALES** provided her cocaine and that **MORALES** and **LUIS** sometimes did cocaine with her prior to commercial sex acts with men. She noted the first time **MORALES** provided her cocaine was at **REINA**'s apartment. She also noted that **MORALES** had been in a relationship with **REINA**. **MORALES** also informed MINOR 2 he wanted to take her to a hotel and be with MINOR 2. He further stated he would pay her better than **LUIS**.

92. MINOR 2 was shown a picture of **ALEXIS SALMERON** and she informed law enforcement that **SALMERON** was a friend of **LUIS**. She stated she met **SALMERON** at **NELSON**'s place. She further stated he used cocaine. Additionally, he had sex with her multiple times on at least two separate days and paid **LUIS** for the sex.

93. MINOR 2 was shown a picture of **JONATHAN RAFAEL ZELAYA** and she stated he was one of **MOISES**'s brothers and was married to **REINA**'s daughter. She first met

JONATHAN at **REINA**'s place. After **REINA** and **JONATHAN**'s wife left, he paid **LUIS** money for sex with **MINOR 2**. He also engaged in sex with her at **NELSON**'s place. **JONATHAN** engaged in sex with **MINOR 2** more than five times and paid **LUIS** the money.

94. **MINOR 2** was shown a picture of a known male who was 17-years old at the time of **MINOR 2**'s exploitation. (hereinafter **K.O.**). **MINOR 2** identified him by name and stated he was **REINA**'s son. She further reported that **K.O.** engaged in sex with **MINOR 2** multiple times and paid **LUIS** money. She recalled the sexual activity occurring at **NELSON**'s apartment and at **REINA**'s apartment. She further noted that **K.O.** would pay for two hours at a time.

95. **MINOR 2** also discussed many of **LUIS**'s friends being at **REINA**'s residence providing her alcohol and having her dance for them. She recalled a time when **LUIS**, **NELSON**, **GILBERTO**, **JONATHAN**, **K.O.**, and three other known associates were all at **REINA**'s apartment during a time when **REINA** was not present. The known associate who requested her to dance then engaged in sex with her in the bedroom for money. She also recalled one of the men recorded her dancing. She could not remember which man recorded her.

**EVIDENCE FROM SOCIAL MEDIA AND OTHER SOURCES
RELATED TO THE SEX TRAFFICKING OF MINOR 2**

96. After **MINOR 2** was recovered by law enforcement, she informed law enforcement that **REINA**'s apartment was near the location where law enforcement recovered her. She later identified the physical location of **REINA**'s apartment after looking at a digital map and a photograph of an apartment building located at 3368 Chillum Road. **MINOR 2** circled some windows on the third floor and identified the location as **REINA**'s apartment. Investigators researched the location through law enforcement databases and found that **REINA HERNANDEZ** was associated with 3368 Chillum Road, Apt 301, Mt. Rainier, Maryland.

97. Law enforcement also obtained data showing a second apartment attributed to **REINA** at 3308 Chauncey Pl #302, Mt Rainier MD.

98. Law enforcement executed search warrants on numerous social media accounts, including accounts with the user name **ELIZABETH HERNANDEZ**. A review of the social media accounts with user name **ELIZABETH HERNANDEZ** contained numerous pictures of **REINA HERNANDEZ** as her profile picture. Additional photos, communications and friend lists further reveal the account was used by **REINA**.

99. A review of **REINA**'s Facebook accounts depicted numerous pictures and conversations with targets of this investigation, including users **GILBERTO MORALES**, **JONATHAN ZELAYA**, **LUIS FIGO**, **MOIZES ZELAYA BONILLA**, **JOSE ELIEZAR HERNANDEZ**, **ALEXIS SALMERON**, and K.O. As for **BONILLA GONZALEZ**, a review of Facebook accounts reveals he was friends with users **LUIS FIGO**, **MOIZES ZELAYA BONILLA**, and **JOSE ELIEZAR HERNANDEZ**.

100. While reviewing **REINA**'s social media accounts, multiple pictures were recovered depicting **REINA** wearing a fitted, sleeveless dress with a unique white and black pattern on the dress showing various shapes.

101. During the investigation, law enforcement obtained messages from **MINOR 2**'s mother, which were sent to her from **MINOR 2** while **MINOR 2** was missing. In a message dated October 9, 2018, law enforcement recovered a picture of **MINOR 2** wearing an identical fitted, sleeveless dress with the unique white and black pattern seen on **REINA**. **MINOR 2** is seen wearing the dress in a bathroom in front of a red shower curtain that is partially open and shows white tile and a black row of tiles towards the top. When **MINOR 2** was asked about this picture,

she informed law enforcement the picture was taken at **REINA**'s apartment and **REINA** gave her the dress to wear.

102. While reviewing the Facebook records tied to K.O., law enforcement found pictures in his Facebook account depicting what appears to be the same bathroom that **MINOR 2** was pictured in with the white tile and black row of tiles towards the top in the shower.

103. Law enforcement also found communications between **REINA** and **LUIS** regarding **REINA**'s ties to MS-13. On September 20, 2018 (14:12:47 UTC), user **ELIZABETH HERNANDEZ** sent a message to **LUIS FIGO** expressing her anger at a man. She stated, in part, "I told him. He doesn't know what I am capable of. I will beat him and the little bitch he is with. That whore son will never wish to have been born....that mother fucker will know what I was before him. Because that whore son cannot take a marera for a fool. I will show him how to respect a woman, especially a woman from El Salvador."

104. Based on your Affiant's training and experience, and through conversations with FBI's native Spanish speakers and linguists, "marera" is a term to describe a female gang member, while "marero" is a term to describe a male gang member.

DIGITAL COMMUNICATIONS REGARDING COMMERCIAL SEX

105. Law enforcement executed search warrants on numerous Facebook accounts, including an account with the user name **MOIZES ZELAYA BONILLA**. Based on the pictures of **MOISES** found therein, along with photographs tied to his residence, friends list, and other communications, law enforcement has probable cause to believe the account was used by **MOISES**. Additionally, law enforcement executed search warrants tied to the Facebook user accounts **LUIS FIGO** and **JONATHAN ZELAYA**. Law enforcement has probable cause to believe the **LUIS FIGO** accounts were used by **LUIS** based on profile pictures depicting him,

friends lists, communications, and photographs of banking checks located therein containing the name **LUIS ALBERTO GONZALES**. Law enforcement executed a search warrant on the account **JONATHAN ZELAYA**. Law enforcement has probable cause to believe the account was used by **JONATHAN** based on pictures found therein of **JONATHAN**, his family, friend lists, and other communications therein.

106. A review of Facebook records reveals photographs and conversations relevant to the sex trafficking of MINOR 2. For example, a few days prior to MINOR 2 arriving at the residence of **MOISES** and **JOSE ELIEZAR**, **MOISES** engaged in conversations regarding commercial sex in a group chat that included Facebook users **JOSE ELIEZAR HERNANDEZ**, **LUIS FIGO**, **ALEXIS SALMERON**, **GILBERTO MORALES**, **JONATHAN ZELAYA**, and K.O. On August 24, 2018 (16:27:37 UTC), Facebook user **MOIZES ZELAYA BONILLA** sent a close up photo of a female's genital region covered in white underwear with a little white bow. Thereafter, user **MOIZES ZEYALA BONILLA** sent a picture of a hand holding \$1200 cash splayed out in \$100 denominations. Based on other photographs located in this investigation, the picture appears to be the backyard patio of **MOISES's** and **JOSE ELIEZAR's** residence. Also visible in the photograph are two \$100 bills laid out on a children toy set on the backyard patio. The photo was date and time stamped August 25, 2018 (00:27:48 UTC). On August 25, 2018 (01:26:45 UTC), user **MOIZES ZELAYA BONILLA** sent a voice message to the group stating: "How much for that little female dog? 30? 20? For a joint? Or of a dose of the little white one [feminine]? How much for that treintera in that picture?"

107. Based on your Affiant's training and experience, your Affiant knows that Hispanic women working in prostitution are commonly referred to as "Treinteras", a term derived from the Spanish word for thirty (treinta). "Treinteras" typically cater their services exclusively to Hispanic

commercial sex customers. "Treinteras" gained this assumed nickname based upon common knowledge amongst their commercial sex customers that the usual price for any sex act performed is thirty dollars.

**COMMUNICATIONS INVOLVING THE
SEX TRAFFICKING OF MINOR 2 BETWEEN MOISES AND LUIS**

108. Law enforcement recovered conversations regarding the sex trafficking of MINOR 2 between **MOISES** and **LUIS** during the time frame when photographs, social media messages, and location data placed MINOR 2 at the residence of **MOISES** and **JOSE ELIEZAR**. An excerpt is below:

MOIZES ZELAYA BONILLA (9-4-18 15:50:57 UTC): What's up **CHINITA**. I'm in the house with **ELIEZAR** resting

LUIS FIGO (9-4-18 15:55:49 UTC): So what's the deal with those young females? Do they like to be stuffed with the cat face or do those bitches just like to smoke? If so, I will bring five sons of bitches to make a train with them

MOIZES ZELAYA BONILLA (9-4-18 15:57:58 UTC): Yes **CHINITA**, they will let you if you sweet talk them

109. Based on your Affiant's training and experience, the phrase "running a train" on a female refers to multiple men having sexual intercourse with a female one after the other in quick succession. Based on your Affiant's training and experience and through the evidence in this case, your Affiant has probable cause to believe that the reference to "making a train" above relates to similar sexual activity.

110. Law enforcement also recovered a Facebook communication between a known associate and **MOISES** dated September 4, 2018 (20:58:14 UTC) where the known associate stated, "Hey dude don't be a pig. Tell **ELIEZAR** to stop doing that with the young females in the

bathroom.” On September 5, 2018 (2:11:37 UTC), **MOISES** responded, “That **ELIEZAR** and those guys are just doing dirty stuff in school.”

111. On September 11, 2018, **MOISES** sent a picture of **MINOR 2** to numerous individuals over Facebook. In the photo, **MINOR 2** is standing in a mirror with her t-shirt lifted and exposing her breasts while wearing a bra with an animal print pattern. The photo was sent to multiple people at various times, including users **LUIS FIGO**, **JONATHAN ZELAYA**, and **ALEXIS SALMERON**. The photo contained the caption “Life will always be like this.”

112. Near the same time that **MOISES** sent the photograph, **MOISES** engaged in multiple conversations regarding the sex trafficking of **MINOR 2**. Some sample excerpts between users **MOISES ZELAYA BONILLA** and **LUIS FIGO/CHINITA** are below:

MOISES ZELAYA BONILLA (9-11-18 19:59:03 UTC): **CHINITA**, call me back mother fucker. Look I have the little young female for you over here. Call [known associate] to bring her to you over there. Tell him you will pay for the gas. I will move the little young female to over there with you. You can have her all week if you want. Just give me something under the table. Call me to talk about that deal. I will send you a picture of the little young female. She is hot. I don’t know what you’ll say.

MOISES ZELAYA BONILLA (9-11-18 19:59:27 UTC) – [Sent photo of **MINOR 2** in the mirror with her t-shirt lifted, exposing her breasts in an animal printed bra and the caption “Life will always be like this.”]

...

MOISES ZELAYA BONILLA (9-11-18 20:05:02 UTC): Call [known associate] tell him to do that move for us. That it is you, and to come here and ask me. And I will tell him yes, that you want him to take her over there. And just give me a joint to smoke with him there. What do you say brother?

LUIS FIGO (9-11-18 20:05:10 UTC) Ok, yes, Bring her. We can have fun here. No problem.

....

MOIZES ZELAYA BONILLA (9-11-18 20:05:51 UTC): ...I will fuck her when I go there but I will leave her with you over there so you can fuck her. Call [known associate].

...

LUIS FIGO (9-11-18 20:06:26 UTC): Have you talked to the young female yet? Is she coming or what? How old is the girl? Can she take it or what? **JONATHAN** says what the fuck.

MOIZES ZELAYA BONILLA (9-11-18 20:17:47 UTC): Don't ask. Just tell me yes or no.

LUIS FIGO (9-11-18 20:20:33 UTC): Ok. We'll be at your house around 7:00. But don't give us bullshit or you know what's coming.

....

LUIS FIGO (9-11-18 20:26:25 UTC): **MOISES** let me know when you have her there and I go to pick her up. And we'll stick the quarter inch in her.

MOIZES ZELAYA BONILLA (9-11-18 20:26:48 UTC) [sent a thumbs up emoji]

MOIZES ZELAYA BONILLA (9-12-18 20:38:29 UTC) – [sent a photo of a hand holding a condom in a green package]

113. With respect to the phrase "the quarter inch" noted above, your Affiant has probable cause to believe that is a code phrase used by the targets of this investigation to mean "penis." Law enforcement uncovered multiple conversations involving the targets discussing sex and/or a picture of an erect penis where the phrase "quarter inch" was used.

COMMUNICATIONS INVOLVING MOISES AND JONATHAN

114. In social media messages between **MOISES** and **JONATHAN**, the following exchange occurred after **MOISES** sent the photograph of MINOR 2 lifting her shirt and exposing her breasts in the mirror:

JONATHAN ZELAYA (9-11-18 20:01:07 UTC): Who the fuck is that young female?

MOIZES ZELAYA BONILLA (9-11-18 20:18:17 UTC): Get ready. I will take her to **CHINITA** now. I told [known associate]. Talk to **CHINITA** and you two can toss her in there, you and **CHINITA**.

MOIZES ZELAYA BONILLA (9-12-18 20:38:39 UTC) – [sent a photograph of a hand holding a condom packaged in a green wrapper]

115. Law enforcement located additional communications between **MOISES** and **JONATHAN** regarding the subsequent sex trafficking of MINOR 2 as follows:

MOIZES ZELAYA BONILLA (9-13-18 01:33:37 UTC): Let me know or find someone who can let her stay over there. No problem about giving her love over there. You know what I mean? Do me that favor. Find out who can welcome my little young female over there.

JONATHAN ZELAYA (9-13-18 01:57:20 UTC) She can stay with [KNOWN ASSOCIATE] I will be there later.

JONATHAN ZELAYA (9-13-18 01:58:58 UTC): What's up **MOISES**? I will send you [KNOWN ASSOCIATE's] address I will be there later

....

MOIZES ZELAYA BONILLA (9-13-18 02:02:34 UTC): Yes, send me the address. **CHINITA** didn't do anything. Son of a bitch. I can't leave the little young female by herself. You know what I mean? If my brother [KNOWN ASSOCIATE] can do me that favor I will take her to you two over there. But seriously, treat the little young female good. The little young female will give [KNOWN ASSOCIATE] love over there and will also give love to you. No problem with that. The little young female is well behaved. Do me this favor and keep her there these days.....

**COMMUNICATIONS INVOLVING GUTIERREZ HERNESTHO AND OTHERS
REGARDING THE TRAFFICKING OF MINOR 2**

116. Law enforcement executed search warrants on Facebook accounts tied to MINOR 2, Facebook user **GUTIERREZ HERNESTHO** and Facebook user **JOSE ELIEZAR HERNANDEZ**. You affiant has probable cause to believe that **SANTOS ERNESTO GUTIERREZ CASTRO** was the user of the **GUTIERREZ HERNESTHO** account based on,

inter alia, photographs of him within the account, statements referring to himself as “Santos Gutierrez” and communications with the victim and targets of this investigation. Your affiant has probable cause to believe the Facebook account with user name **JOSE ELIEZAR HERNANDEZ** was used by **JOSE ELIEZAR MOLINA-VELIZ** based on, *inter alia*, photographs of him within the account, his friends list, and communications with the victim and targets of this investigation.

117. A review of Facebook communications shows user **GUTIERREZ HERNESTHO** communicating with MINOR 2 and coordinating commercial sex transactions. For example, on or about September 9, 2018 (08:16:28 UTC), MINOR 2 told **GUTIERREZ HERNESTHO** she wanted to have sex and he told her he wanted to have sex too. On September 9, 2018 (19:09:02 UTC), MINOR-2 asked **GUTIERREZ HERNESTHO** to send the address of where he wanted her to go. **GUTIERREZ HERNESTHO** told MINOR-2 to go to Gableridge Turn, Woodbridge VA, and told her that he was there. Shortly after, MINOR-2 asked him if he would have a gift for her and she sent him an emoji of a nose with an object just below the nostril. Based on the image and your Affiant’s knowledge tied to this investigation, it appears the gift was a reference to cocaine. **GUTIERREZ HERNESTHO** replied that MINOR 2 could have whatever she wanted and stated there would be “joints” available.

118. Thereafter, law enforcement recovered communications showing **GUTIERREZ HERNESTHO** coordinating men having sex with MINOR 2. For example, on September 10, 2018 (08:29:37), **GUTIERREZ HERNESTHO** sent a message to a specific male over Facebook messenger asking, “Do you want to fuck.” An audio call then occurred between **GUTIERREZ HERNESTHO** and the male user.

119. On September 11, 2018 (18:28:68 UTC), **GUTIERREZ HERNESTHO** sent a photo of MINOR 2 to Facebook user **MOIZES ZELAYA BONILLA** showing MINOR 2 with

her shirt lifted, exposing her breasts in a mirror. Communications between **GUTIERREZ HERNESTHO** and **MOIZES ZELAYA BONILLA** reveal them discussing a specific address of the location of MINOR 2.

120. From September 9, 2018 to September 12, 2018, **GUTIERREZ HERNESTHO** and a specific male discussed via Facebook messenger, giving a female drugs and having sex with that female. On September 9, 2018 (16:38:31 UTC) **GUTIERREZ HERNESTHO** also told the specific male, "Another homie went to put her to work." On September 12, 2018 (15:11:39 UTC) **GUTIERREZ HERNESTHO** sent a message to the same male over Facebook messenger stating, "I have her here." Pursuant to a search warrant executed on the Facebook account of MINOR 2, law enforcement discovered GPS location data that shows on September 12, 2018 (15:16:19 UTC), MINOR 2 was at a specific address on Greenacre Drive in Woodbridge, Virginia.

121. During the investigation, law enforcement drove MINOR 2 around Woodbridge, Virginia, in order to retrace her steps during her time of exploitation. During this encounter, MINOR 2 identified the same residence on Greenacre Drive, as a place where she had stayed during her time of exploitation.

122. Law enforcement sent an administrative subpoena to T-Mobile on January 8, 2020 regarding a specific number attributed to **GUTIERREZ HERNESTHO's** Facebook account. T-Mobile subscriber information listed the customer name as **ERNESTO GUTIERREZ** [sic], with the same aforementioned Greenacre Drive address. T-Mobile also stated that the subscriber, **ERNESTO GUTIERREZ** [sic], had remained the same from January 1, 2018 to the date of the request January 8, 2020.

123. Law enforcement found additional Facebook communications relevant to the investigation. For example, on September 15, 2018 (08:29:50 UTC), **GUTIERREZ HERNESTHO** told **MOIZES ZELAYA BONILLA**, "Your [prey/female inmate] is here."

124. On September 17, 2018, Facebook user **JOSE ELIEZAR HERNANDEZ** sent a message to **GUTIERREZ HERNESTHO** stating, "Dog. Tell that guy with you that a girl named [MINOR 2's first name] is asking around because she doesn't know who is the father of her baby. If it is you, him, or those 500 we lined up."

**COMMUNICATIONS AND VIDEOS
INVOLVING NELSON CABALLERO AND ALEXIS SALMERON**

125. A review of social media evidence uncovered communications and photographs showing that MINOR 2 was harbored at **NELSON EZEQUIEL CABALLERO PORTILLO's** apartment while being sexually exploited.

126. For example, on September 13, 2018 (09:43:41 UTC), **LUIS** sent a photograph of a piece of mail to **MOISES** with the following address information: "**Nelson E. Caballero Portillo**, 6235 Springhill Dr Apt 301, Greenbelt, MD 20770." After sending the photograph, **LUIS** stated, "That's the address. Who is with the girl?"

127. Law enforcement executed search warrants on a social media account with the user name **NELSON CABALLERO**. The social media account contained profile pictures of the male known by law enforcement to be **NELSON EZEQUIEL CABALLERO PORTILLO**, statements, friend lists, photos of his vehicle registration, driver's license, and other user attribution evidence showing that the account was used by **NELSON**.

128. In the **NELSON CABALLERO** Facebook account, law enforcement located photographs of **NELSON** standing in a bathroom taking selfies of himself. The mirror, sink, faucet, towel, and other items were visible. Law enforcement compared the bathroom setting to

the photograph that MINOR 2 posted in a group chat on September 22, 2018 showing her bruised buttocks while standing before a bathroom mirror. The backgrounds of the photos match, revealing that MINOR 2 was at **NELSON**'s apartment.

129. Pursuant to a search warrant executed on the Facebook account of MINOR 2, law enforcement discovered GPS location data that shows on September 22, 2018 (16:39:18), September 23, 2018 (01:40:00 UTC), and September 23, 2018 (19:59:22), that MINOR 2 was located either at or around 6235 Springhill Dr, Greenbelt MD.

130. Social media records reveal that **NELSON** sent MINOR 2 a "friend request" over Facebook on September 22, 2018 (17:27:56 UTC).

131. Communications between **NELSON** and others further show that MINOR 2 was sex trafficked at **NELSON**'s apartment. For example, on September 22, 2018 the following statements were made between users **NELSON CABALLERO** and **LUIS FIGO**:

NELSON CABALLERO (9-22-18 13:25:35 UTC): Dude is that girl staying in the apartment Because if she stays we have to talk about more money

LUIS FIGO (9-22-18 20:53:38 UTC): We are partners on that one [feminine] we have over there...

132. Additionally, **NELSON** sent a picture of MINOR 2 over social media to user **ALEXIS SALMERON** and stated, in part, the following:

NELSON CABALLERO (9-22-18 17:01:21 UTC): Chino brought his dirty girl

ALEXIS SALMERON (9-22-18 17:08:59 UTC): I don't believe you

NELSON CABALLERO (9-22-18 17:09:33 UTC): Yes dude I have to charge more rent That lazy girl

ALEXIS SALMERON (9-22-18 17:22:55 UTC): Ok and what we will do later

NELSON CABALLERO (9-22-18 17:31:38 UTC): They invited me to a party at 3:00

ALEXIS SALMERON (9-22-18 17:31:59 UTC to 17:32:07): Really But we are going out today

NELSON CABALLERO (9-22-18 17:32:15 UTC): Yes Tonight

NELSON CABALLERO (9-22-18 17:32:27 UTC): [Sent a picture of MINOR 2 sitting on a bed while holding and looking at a phone screen]

....

NELSON CABALLERO (9-22-18 17:32:32 UTC): Chino's girl

ALEXIS SALMERON (9-22-18 17:32:48 UTC to 17:32:57 UTC) Oh really Are you taking care of her

NELSON CABALLERO (9-22-18 17:32:58 UTC): She says she is marera [i.e., a female gang member]

ALEXIS SALMERON (9-22-18 17:33:08 UTC): I don't believe you...I will go to touch her... What does she says [sic]

NELSON CABALLERO (9-22-18 17:33:38 UTC and 17:34:18 UTC): She says that they jumped her three days ago She has the legs bruised ...I think she said it was 13 hits with a baseball bat

....

NELSON CABALLERO (9-22-18 17:38:18 UTC): **CHINO** wanted to send me to the living room yesterday

ALEXIS SALMERON (9-22-18 17:44:18 UTC) – JJJJjjjjjjj What a joke he wanted a good fuck

NELSON CABALLERO (9-22-18 17:44:51 UTC and 17:45:13 UTC) – And the girl didn't let him because her legs hurt. Let them fuck in the living room. The room is mine

133. Law enforcement executed a search warrant on the Facebook user **ALEXIS SALMERON**. The social media account contained profile pictures of the male known by law enforcement to be **ORLANDO ALEXIS SALMERON FUNEZ**, along with statements, friend lists, email account information, and other user attribution evidence showing that the account was used by **SALMERON**.

134. A review of the **ALEXIS SALMERON** Facebook account revealed videos and photographs depicting MINOR 2 and multiple targets of this investigation at **NELSON's** residence. For example, on 9-23-2018 (00:37:19 UTC), user **ALEXIS SALMERON** sent a video over Facebook showing him holding a bag of a green leafy substance and stating, "This weed is good!" In the video, **SALMERON** is wearing a black t-shirt containing red or orange coloring on the shoulders. Later in the video, **GILBERTO MORALES** is seen wearing a white t-shirt with a blue Nike logo. A male voice that sounds like **SALMERON's** voice states, "That's my partner/associate." A visual comparison of the background of the video showing the wood floor, white blinds covering a sliding door, and the kitchen matches other photographs matching **NELSON's** residence. On 9-23-18 (02:59:54 UTC), user **ALEXIS SALMERON** sent a picture of him and **LUIS** standing in front of the two black couches and white blinds in **NELSON's** residence. **SALMERON** is wearing the same black t-shirt described above while holding a clear plastic bag containing a white substance that appears to be cocaine. **LUIS** is holding a clear plastic bag containing a green leafy substance that appears to be marijuana and a beer. **LUIS** is wearing a black t-shirt with a picture of Marilyn Monroe. A hookah lamp is seen on the wooden floor with two men seated on one of the black couches behind them.

135. On 9-23-18 (15:44:30 UTC), an associate sent a video over Facebook that was recovered in the Facebook account of **ALEXIS SALMERON**. In the video, **NELSON** is seen in his own residence wearing a red or orange tank top and black work-out pants. **SALMERON** is seen in the video wearing a red polo shirt and **MORALES** is seen wearing a orange, white, and blue striped polo shirt. The kitchen table shows a bottle of alcohol and a hookah lamp. Additional videos and photographs recovered show **NELSON** smoking a substance from the hookah and sitting with multiple guys on the black couch, including **SALMERON**. An

additional video shows **MORALES** in his orange, blue, and white striped polo holding a plastic bag with a white substance that appears to be cocaine. In the video, **MORALES** stated, "Do we have cocaine" while holding the bag of white powder near his face. On 9-23-18 (21:48:27 UTC), an individual known to law enforcement with a specific Facebook user account [hereinafter referred to as "J.J."] sent a video to **ALEXIS SALMERON** and others showing **MINOR 2** seated on one of the black couches with the same men while the men are drinking beer. Part of the hookah lamp is visible.

136. On September 24, 2018, user **NELSON CABALLERO** informed **ALEXIS SALMERON** over social media that **CHINO** disrespected him at the apartment while **CHINO** and **CHUCHA** were intoxicated. **NELSON** also discussed **MINOR 2** being present. While explaining what happened, **NELSON** stated in part: "**CHINO** said to me hey vato, cut the bullshit. You don't even let me fuck in peace. I told him we will talk tomorrow when you are sober, but this shit is not over. Your marero talk does not intimidate me...."

137. **NELSON CABALLERO** further stated to **ALEXIS SALMERON**, in part: "The problem is that that little bitch have come to fuck everything up. I don't like that she is staying there. I will talk to **CHINO** today, she leaves or both of them leave. I am not getting in trouble. They are looking for that little girl to jump her because she owes I don't know how many hits with a baseball bat. They will come to the apartment and I will get in trouble because I am the owner of the apartment. All of us will get in trouble."

138. In the Facebook communications, **NELSON CABALLERO** further stated to **ALEXIS SALMERON**, "I asked the little girl how old she was. She said she was 18, bullshit she is not 18. If the police comes one of these days, I will be the one getting in trouble. I will talk to **CHINO**. I made the deal with him."

139. Law enforcement recovered additional communications where **NELSON CABALLERO** informed another individual on September 24, 2018 the following: "I kicked a guy out of the apartment today. He brought a girl to the apartment. She is a minor and that is a serious offense over here. So I kicked them out."

140. Law enforcement uncovered additional communications involving commercial sex from the **NELSON CABALLERO** Facebook account:

"J.J." (10-29-18 16:35:39 UTC): Did you go to fuck the treinteras?

NELSON CABALLERO (10-29-18 16:39:26 UTC): Do you have a female friend that would let me have it for money? I will pay her.

"J.J." (10-29-18 16:40:39 UTC): I will get you one [feminine] on Friday.

NELSON CABALLERO (10-29-18 16:49:14 UTC): Ok Get me one [feminine.]

5. Law enforcement recovered additional communications and photographs relevant to the investigation, including communications between **NELSON CABALLERO**, **ALEXIS SALMERON**, and "J.J." indicating that the three of them were living at **NELSON**'s residence. It appears **ALEXIS SALMERON** began living at his residence around the end of September through at least October 2018. Law enforcement also recovered multiple photographs and videos of **NELSON** with **LUIS**, **GILBERTO**, and others while working in construction and spending time together in other social settings.

**ADDITIONAL COMMUNICATIONS INVOLVING LUIS, JOSE ELIAZAR,
AND K.O. TRAFFICKING MINOR 2 IN MARYLAND**

141. During the investigation, law enforcement executed a search warrant on a social media account tied to an individual hereinafter referred to as K.O., the son of **REINA** who was 17 at the time **MINOR 2** was sex trafficked. Your affiant has probable cause to believe that K.O. operates the above referenced social media account based on known pictures of K.O. posted as profile pictures, along with statements and friend lists contained therein. Below are some relevant

communications located in the Facebook accounts tied to K.O., user **LUIS FIGO**, and **JOSE ELIEZAR HERNANDEZ**:

K.O. to LUIS FIGO (9-22-18 18:37:48 UTC): [Portion summary of audio call] Why didn't you want to pass the young girl? You fell in love motherfucker! What the fuck!

....

K.O. to JOSE ELIEZAR HERNANDEZ: (9-22-18 18:45:13 UTC): **ELIE, ELIE**, What the fuck? Did you bring the girl to fuck [have sex] or to fall in love with **CHINA**? What the fuck?

JOSE ELIEZAR HERNANDEZ to K.O.: (9-22-18 18:52:28 UTC): What do you mean? What's going on? What does that little girl say of **CHINITA**? What does **CHINITA** say? Is he eating that little girl? Yes or no?

....

K.O. to LUIS FIGO (9-28-18 18:52:23 UTC): [Portion summary of audio call] Dude, at what time will you come? Because your girlfriend here says that she wants to be with you right now.

....

142. On October 2, 2018 (23:02:17 UTC), **LUIS FIGO** asked K.O. which one of them would keep "the catracha." Based on your Affiant's training and experience, including conversations with native Spanish speakers and the FBI linguist in this matter, "Catracha" is a term used to describe a female from Honduras. Through interviews with MINOR 2 and other data, your Affiant knows that MINOR 2 was born in Honduras. Facebook communications between **LUIS FIGO** and MINOR 2 on Facebook further show that **LUIS** called her "Catracha" when speaking with her. In the communications with K.O., **LUIS FIGO** stated, "Hi [K.O.]. Have dinner ready for me papis. I will be there in about six minutes. We will talk seriously. Will you keep the catracha or do I keep her?"

143. On October 3, 2018 (14:58:52 UTC), **LUIS FIGO** sent a message to K.O.'s Facebook account stating, "Fuck [K.O.]! You just fuck [have sex] but you don't pay. You must pay man! Shit! Just for free."

144. On October 4, 2018 (00:19:56 and 00:21:41 UTC) K.O. stated via Facebook Messenger, "It cannot be. When I have weed it goes ugly for me with **JONA** and you. You [plural] don't let me even sell it. Fucking assholes. You put 20 of weed in each joint we smoked last night. Now you have left me with a debt I cannot pay by myself." Based on your Affiant's review of the communications and evidence in this case, your Affiant has probable cause to believe that "**JONA**" is short for **JONATHAN**.

145. On October 4, 2018 (22:28:14 UTC), **LUIS FIGO** sent a voice message to K.O. stating in part "What the fuck," and further stated that MINOR 2 is now using K.O.'s last name. In the message, **LUIS FIGO** called MINOR 2 by her actual first name.

146. Additionally, law enforcement found Facebook communications between MINOR 2 and **JOSE ELIEZAR** on October 1, 2018. In this communication, MINOR 2 told **JOSE ELIEZAR** that she was smoking with K.O. and her "husband." **JOSE ELIEZAR** asked her who her husband was and MINOR 2 stated she is referring to her husband **CHINA**. **JOSE ELIEZAR** then told her it is fine that she was with **CHINA** and asked if she was behaving. **JOSE ELIEZAR** then told her that he would come to her location to see her that Saturday.

147. On October 2, 2018 (03:14:47 UTC), Facebook user **JOSE ELIEZAR HERNANDEZ** sent a message on a group chat over Facebook to various targets of this investigation, including **MOISES**, **JONATHAN**, and **GUTIERREZ HERNESTHO** stating, "Who is getting the joint, coca, the beer? I will get the little whores."

**LAW ENFORCEMENT RECOVERED VIDEOS OF MINOR 2 WHILE
TRAFFICKED IN MARYLAND, INCLUDING A CHILD
PORNOGRAPHY VIDEO OF MINOR 2**

148. Law enforcement recovered videos of MINOR 2 while being sex trafficked in Maryland. For example, on October 11, 2018 (20:46:23 UTC), **ALEXIS SALMERON** sent a video over Facebook showing **ALEXIS SALMERON**, MINOR 2, **LUIS**, and K.O. standing together outside of what appears to be the Queenstown apartment complex. In the video, **ALEXIS SALMERON** appears to be holding his phone to capture the video while also holding what appears to be a marijuana joint.

149. Law enforcement also recovered a video of child pornography that was sent to the **LUIS FIGO** Facebook account on October 11, 2018. In one of the videos, MINOR 2 is lifting up her t-shirt and exposing her breasts while wearing a bra. There is a condom packet in her bra located near her sternum. She is laying on distinct bedding. In written messages, MINOR 2 informed **LUIS FIGO**, in part: "He is going to take a shower first he says." **LUIS** replied, "**SALMERON** is asking that you send him one naked." MINOR 2 replied, "Wait for that guy to get out of the bathroom first." Later MINOR 2 replied, "He is fucking me now." MINOR 2 then sent a video on October 11, 2018 (21:38:45 UTC), of herself on her hands and knees on a bed. In the video, her body and breasts are moving back and forth while it appears someone is sexually penetrating her from behind while she is on all fours. It appears MINOR 2 is being sexually penetrated on the same distinct bedding. MINOR 2 then sent a "thumbs up" emoji shortly after she sent the video (21:39:07 UTC). In response to the video, **LUIS FIGO** sent a "thumbs up" emoji at 21:41:33 UTC, in what appeared to be approval for the video sent by MINOR 2.

**COMMUNICATIONS INVOLVING GILBERTO MORALES,
A/K/A CHUCHA, A/K/A CHAPIN**

150. When law enforcement recovered MINOR 2 on October 11, 2018, law enforcement seized a phone in her possession. When reviewing the contacts listed in MINOR-2's phone, law enforcement found a contact by the name of "**Chapin**", with two emoji peace signs and an emoji blush face next to the name. The phone number associated with "**Chapin**" was 202-910-0227.

151. Through open source research, law enforcement found a WhatsApp account tied to the phone number listed under the contact "**Chapin**" with a profile picture attached. The picture associated with the WhatsApp account was a picture of **GILBERTO MORALES**.

152. With further review, law enforcement discovered that **MORALES** and MINOR-2 had at least 129 contacts with each other via the phone number listed above from October 7, 2018 to October 15, 2018. These contacts are either established communications or attempts to contact.

153. A search warrant was executed on social media accounts belonging to **MORALES**, including a Facebook account with the user name **GILBERTO MORALES**. A review of the photographs, friends lists, and communications reveals that the account was used by **MORALES**.

154. On September 26, 2018 (18:41:25 UTC), **MORALES** sent an audio message to **ALEXIS SALMERON** stating in part, "We are [partners/associates] in that one [feminine] we have at home. That little, tiny mami. So, **SALMERON** don't you want to be a [partner/associate] with the mamis? With **CHINITA**? Or what the fuck?"

155. Additional communications were located involving **GILBERTO MORALES** and **LUIS FIGO** as follows:

LUIS FIGO (9-30-18 00:19:16 UTC): **CHUCHA**, do you want to stick in the ¼ inch? Yes or no. Tell me right now. I have a young female for you.

GILBERTO MORALES (9-30-18 01:00:21 UTC): Tell me fucking baby. Are we partners on the Catrachita or what the fuck?

156. A review of photographs, videos, and conversations also revealed that **MORALES** and **LUIS** were involved in both the consumption and distribution of drugs, including cocaine and marijuana. On October 12, 2018, **MORALES** informed **LUIS FIGO** in part, “[O]n Saturday and Sunday I was like Chapo Guzman trafficking drugs. I was a fucking drug trafficker. Now comes regret.”

157. A review of social media records also reveals a photograph of MINOR 2 that user **LUIS FIGO** sent to user **GILBERTO MORALES**. Specifically, on or about November 23, 2018, **LUIS FIGO** sent a picture depicting a close up of MINOR-2’s breasts while she is wearing a bra. She has a packaged condom in the middle of her bra near her sternum. A unique birth mark around her breast area is visible. That birthmark is known to belong to MINOR-2. The photograph appears to be a still shot of the child pornography video discussed above when she was being penetrated from behind while on all fours.

**MEDICAL FINDINGS TIED TO THE
SEXUAL EXPLOITATION OF MINOR 2**

158. When MINOR 2 was medically examined shortly upon her recovery in mid-October 2018, she was tested for sexually transmitted infections. Chlamydia trachomatis was detected in MINOR-2’s urine and rectal swab samples.

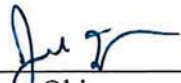
159. She was also found to have pelvic inflammatory disease (PID), a serious complication that occurs when a sexually transmitted infection(s) ascends and infects the structures of the upper genital tract, such as the uterus, fallopian tubes, ovaries and even abdominal or pelvic organs.

CONCLUSION

160. Based on the facts above, there is probable cause to believe that during the time frame from on or about August 27, 2018 through September 20, 2018, in the Eastern District of Virginia, **SIONI ALEXANDER BONILLA GONZALEZ**, a/k/a **SONIC**, a/k/a **ALEXANDER BONILLA**; a/k/a **CERBERO GONZALEZ**, a/k/a **CATRACHITA GONZALEZ**; and **CARLOS JOSE TURICIOS VILLATORO**, a/k/a **JOSE FUNES**, a/k/a **GUZMAN ANTONIO**, a/k/a **OCULTO**, a/k/a **ESCONDIDO**, and others known and unknown, engaged in violent crimes in aid of racketeering activity in violation of 18 U.S.C. §§ 1959(a)(3) and 2.


161. Based on the facts above, there also is probable cause to believe that during the time frame from on or about August 27, 2018 through October 11, 2018, in the Eastern District of Virginia and elsewhere (1) **MOISES ORLANDO ZELAYA-VELIZ**, a/k/a **MOISES ZELAYA-BELIZ**, a/k/a **MOIZES ZELAYA BONILLA**, a/k/a **ZELAYA HERNANDEZ**; (2) **SIONI ALEXANDER BONILLA GONZALEZ**, a/k/a **SONIC**, a/k/a **ALEXANDER BONILLA**, a/k/a **CERBERO GONZALEZ**, a/k/a **CATRACHITA GONZALEZ**; (3) **JOSE ELIEZAR MOLINA-VELIZ**, a/k/a **JOSE ELIEZAR HERNANDEZ**; (4) **SANTOS ERNESTO GUTIERREZ CASTRO** a/k/a **GUTIERREZ HERNESTHO**; (5) **LUIS ALBERTO GONZALES**, a/k/a **LUIS FIGO**, a/k/a **CHINA**, a/k/a **CHINITA**; (6) **REINA ELIZABETH HERNANDEZ**, a/k/a **ELIZABETH HERNANDEZ**; (7) **NELSON EZEQUIEL CABALLERO PORTILLO**; (8) **GILBERTO MORALES**, a/k/a **CHAPIN** a/k/a

CHUCHA; (9) JONATHAN RAFAEL ZELAYA-VELIZ, a/k/a RAFAEL ZELAYA, a/k/a JONATHAN ZELAYA and (10) ORLANDO ALEXIS SALMERON FUNEZ, a/k/a ALEXIS SALMERON, a/k/a ALEXIS FUNEZ engaged in sex trafficking of a minor in violation of 18 U.S.C. §§ 1591(a)(1), (b)(1), (c) and 2.



Jeremy Obie
Special Agent
Federal Bureau of Investigation

Sworn and subscribed to before me this 31st day of July 2020.



Digitally signed by Michael S.
Nachmanoff
Date: 2020.07.31 13:14:23 -04'00'
Honorable Michael S. Nachmanoff
United States Magistrate Judge